

EXHIBIT A

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Attorney for Plaintiff

COPY

CLERK OF THE
DISTRICT COURT
KRISTIE LEE BOELTER
2015 OCT 14 PM 3 09
FILED
BY _____
DEPUTY

**MONTANA THIRTEENTH JUDICIAL DISTRICT COURT,
YELLOWSTONE COUNTY**

ROXANNA JACKSON,

Plaintiff,

v.

ST. VINCENT HEALTHCARE,

Defendant.

Cause No.: DV 15-1350

Judge: GREGORY R. TODO

**COMPLAINT AND DEMAND
FOR JURY TRIAL**

Plaintiff, by and through her counsel of record, Sather & Holm, PLLC, states and alleges as follows:

COMPLAINT

1. Plaintiff is an individual who, at all relevant times, resided in Billings, Yellowstone County, Montana. Plaintiff currently resides in Colorado.
2. Upon information and belief, Defendant is a Montana corporation doing business in Billings, Yellowstone County, Montana.
3. Plaintiff filed a charge of discrimination against Defendant with the Montana Human Rights Bureau and United States Equal Opportunity Commission. On

or about September 22, 2015, a Final Agency Decision was issued, granting Plaintiff the right to file suit against Defendant. As a result, Plaintiff has exhausted her administrative remedies.

4. Plaintiff was employed by Defendant in Billings, Yellowstone County, Montana, at all relevant times until August 27, 2014 when her employment was terminated.

5. Plaintiff is a qualified individual with a physical or mental disability.

6. Defendant is a covered entity under the Americans with Disabilities Act and an employer subject to the Montana Human Rights Act.

7. Defendant intentionally discriminated against Plaintiff on the basis of her disability or disabilities, failed to accommodate Plaintiff's disability or disabilities, and retaliated against Plaintiff for her protected activity, all in violation of the Americans with Disabilities Act and the Montana Human Rights Act.

8. As a result of Defendant's actions, Plaintiff has suffered compensatory and other damages and is entitled to an award for all available damages, punitive damages, attorneys' fees, costs, and equitable relief.

WHEREFORE, Plaintiff requests relief as follows:

1. For judgment to be entered against Defendant and in Plaintiff's favor;
2. For those damages allowed by law for the injuries and losses to Plaintiff;
3. For punitive damages;
4. For attorneys' fees and costs;
5. For equitable relief; and
6. For such other relief as the Court may deem just and proper.

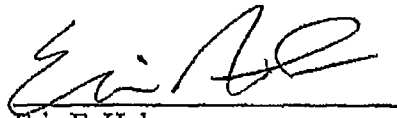
DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all issues so triable.

DATED this 14th day of October, 2015.

SATHER AND HOLM, PLLC

By:

A handwritten signature in black ink, appearing to read "Eric E. Holm", written over a horizontal line.

Eric E. Holm

Attorney for Plaintiff

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Date: October 14, 2015

Kristie Lee Boelter: Clerk of the District Court

(Seal)

By: 

Deputy Clerk

